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2 LAW OFFICE OF
3 BESS M. BREWER & ASSOCIATES
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7 Attorneys for Plaintiff

8 **IN THE UNITED STATES DISTRICT COURT**
9 **EASTERN DISTRICT OF CALIFORNIA**

10 **MONIQUE R. KANE**

11)
12)
13)
14 **Plaintiff,**
15)
16)
17 **Defendant.**
18)
19)

Case No. 14-2419 CKD

**STIPULATION AND PROPOSED
ORDER EXTENDING PLAINTIFF'S
TIME TO FILE SUMMARY
JUDGMENT MOTION**

v.

20 **CAROLYN W. COLVIN,**
21 **ACTING COMMISSIONER OF SSA**

22 **Defendant.**

23 IT IS HEREBY STIPULATED by and between the parties, through their attorneys, that
24 Plaintiff's time to file her summary judgment motion is hereby extended from April 10, 2015, to April
25 20, 2015, with all other deadlines extended accordingly. This extension is required due to counsel's
26 failure to re calendar the due date for Ms. Kane's summary judgment motion. (See declaration.)

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28 *////*

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1 I, Bess M. Brewer, Declare:

2 1. I am an attorney licensed the practice law in California and am admitted
3 to practice before this Court. I represent the plaintiff in the above
4 referenced case.

5 2. Plaintiff's motion for summary judgment was extended to April 10,
6 2015, unfortunately, I failed to re calender the new due date. I just
7 became aware of the oversight today.

8 3. I apologize to the Court for my failure to file Ms. Kanen's summary
9 judgment motion on time.

10 I declare under the penalty of perjury that the foregoing is true and correct to the best of my
11 knowledge, and that this declaration was executed on April 14, 2015. In Sacramento, California.

12 /s/ Bess M. Brewer

13 BESS M. BREWER

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16 Dated: April 14, 2015

/s/Bess M. Brewer
BESS M. BREWER

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18 Attorney at Law

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22 Dated: April 14, 2015

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Benjamin B. Wagner

United States Attorney

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Donna L. Calvert
Regional Chief Counsel, Region IX
Social Security Administration

25

/s/Ann Lucille Maley
ANN LUCILLE MALEY

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Special Assistant United States Attorney

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Attorneys for Defendant

ORDER

APPROVED AND SO ORDERED.

Dated: April 16, 2015



CAROLYN K. DELANEY
UNITED STATES MAGISTRATE JUDGE

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